

CPRE Hertfordshire initial commentary and analysis on Part 4 Local Plan Regulation 18 Three Rivers Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land (Three Rivers District Council - October 2023)

About us

CPRE Hertfordshire is a local countryside charity. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.

Founded in 1928 we are a grassroots organisation, with 800 members and a team of 4 part-time staff and a few dozen volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

If you would like to help, then please consider [becoming a member](#) or [making a donation](#). Further information about all of our work can be found on [our website](#). Thank you.

CPRE Hertfordshire is a Charitable Incorporated Organisation Registered charity number: 1162419. CPRE holds and manages data in strict accordance with the Data Protection Act (2018). Read our Privacy Policy on our website.

Introduction

This document has been compiled by CPRE Hertfordshire's planning specialists and volunteers. It provides a source of information to help members, local organisations and campaign groups develop their response to the most recent public consultation on what is termed Part 4 Local Plan Regulation 18 Three Rivers Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land.

We will publish a more detailed technical report later in the month which can also be used to support your response.

Comments on the Part 4 Local Plan should be submitted to Three Rivers District Council by 11pm on Sunday 10th December 2023 via:

- The on-line consultation platform and questionnaire at:
<https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan>
- By post to:
Planning Policy, Three Rivers District Council,
Three Rivers House, Northway, Rickmansworth, Hertfordshire, WD3 1RL
- The consultation does not invite responses by email. If you wish to contact the Council to pursue this option we suggest you try localplanconsult@threerivers.gov.uk

General background

- The current stage of the process is a partial consultation on a preferred policy option for housing allocations under Regulation 18 of the relevant Planning Acts.
- This consultation does not seek responses on a comprehensive Local Plan approach which was established by the Part 1 document.
- There is no obligation on Three Rivers District Council to include all or any of the proposed provisions in the next, formal version of the Local Plan when it is published.
- Anyone can comment to the Council on any aspect of the consultation and associated documents, in writing, through the Council's consultation platform or by post. Although the Council has asked you to respond to specific questions on the policy option and proposed allocated sites, there is no requirement to do so but it is helpful to specify the question, policy or site to which you are responding.
- The Council must consider all comments made that are relevant to the Part 4 Local Plan, before deciding what to include in the next version, also known as the Publication or Submission Local Plan.
- The Publication Local Plan will then be subject to a minimum six week consultation during which anyone can make representations on whether or not the Plan is 'sound' as defined by Local Plan Regulations.
- Any such representations that the Plan is unsound or not legally compliant will be considered by a Planning Inspector during a subsequent public examination of the Local Plan.

Our point of view

CPRE Hertfordshire believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. We believe that planning is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily.

Overall position

CPRE Hertfordshire welcomes the Council's present consultation for 'Lower Housing Growth Option Protecting More Green Belt Land' which we believe responds to significant local community concerns, with specific regard to the importance of designated protected land such as Green Belt and Areas of Outstanding Natural Beauty (AONB). Recent Local Plan public consultations in neighbouring Districts such as Hertsmere and Dacorum, have also indicated considerable public concern about the potential loss of highly valued open countryside, and we support fully Three Rivers District Council's commitment to wider environmental objectives.

Specifically, we welcome the Council's commitment to sustainable development and recognition of the importance of "effective protection of the environment" (paragraph 1.9) and "prudent use of natural resources" (paragraph 1.9). "The maintenance of stable levels of economic growth and employment" (op cit) are also entirely appropriate objectives for the Local Plan.

In its consultation survey, the Council poses two key questions relating to the principle of providing for housing need taking account of policy constraints and local conditions, particularly with regard to the designated protected land, as noted above, which comprises virtually all the non built-up land in the District. We comment on these two main principles below.

Providing for housing need

Previous consultations on the Three Rivers Local Plan included allocations of land for housing based on the Government's 'Standard Method' of calculating housing need and the Council asks in its consultation survey question 1 whether it is appropriate not to comply with this formula owing to the Green Belt. The Standard Method utilises household projections from 2014 based data and it is becoming increasingly out-of-date leading to inflated results for housing need in local planning authorities throughout the country. CPRE continues to campaign vigorously at both national and local scales for a more appropriate formula for assessing future housing requirements than the Standard Method.

The Council continues to apply the Standard Method calculation in the Part 4 Local Plan but acknowledges that the resulting housing target is too high and does not represent the actual development needs for the area. The Government has indicated that amendments will be made to national policy and guidance regarding the use of the Standard Method when new population data is published in 2024. We would urge the Council to further review its housing need calculations and housing targets as soon as these long overdue amendments are published.

CPRE Hertfordshire agrees with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt.

We are pleased to note that the Council has taken full cognisance of the National Planning Policy Framework (NPPF) in applying the policy test introduced in the NPPF paragraph 11 and footnote 7 relating to local conditions. This test indicates that housing need may be assessed against policy constraints that include a range of protected land designations, including Green Belt and Areas of Outstanding Natural Beauty, which may be applied to produce a housing target for inclusion in the Local Plan.

The Council has applied the policy test in areas where development would cause "very high, high and moderate-high harm" to the Green Belt as assessed in the Stage 2 Green Belt

Review. This has the effect of reducing very considerably the amount of Green Belt which is proposed to be released, from nearly 250 to 57 hectares.

CPRE Hertfordshire fully supports the Council’s approach in applying NPPF paragraph 11 and footnote 7 in assessing housing need against Green Belt policy constraints.

It should lead to a re-assessment of housing need and housing target figures in all local planning authorities with a high proportion of designated protected land. The Council joins 60 other local planning authorities in England reviewing their position regarding the calculation of future housing requirements.

The Council has not applied the policy test to the whole of the Green Belt in the District, which would be our preferred position, but has concentrated on where most harm would be caused.

Brownfield First

The Part 4 Local Plan suggests that 988 dwellings can be accommodated on previously developed land (brownfield land) within the plan period and we believe that this may be an under-estimate and would press the Council to re-assess opportunities for re-development. It may be necessary to re-consider the criteria used for urban capacity and similar studies, and the potential role of windfall sites. CPRE campaigns nationally for the use of previously developed sites before any other land is considered.

Protecting More Green Belt Land

The second major question posed (survey Question 3) illustrates the Council’s clear intention to respond to both local conditions and the expressed views of local communities.

CPRE Hertfordshire agrees strongly that the Council’s preferred “Low Growth and Green Belt Restraint” strategy is appropriate.

The Council also notes that the acute need for housing, especially for affordable homes in high cost areas such as Three Rivers, “cannot be addressed at the cost of harming existing communities and resulting in unacceptable harm to the Green Belt” (paragraph 2.3). In our extensive experience of reviewing residential proposals in Hertfordshire, development in the Green Belt appears never to address the need for truly affordable homes.

It is increasingly accepted that the existing methods of attempting to achieve affordable housing through the imposition of planning obligations on private developers are failing to make any appreciable impact on the problem. Initial commitments by developers for affordable housing are frequently revised downwards, generally for reasons of viability.

The largest proportion of proposals, in terms of units, for residential development on Green Belt are made by volume house-builders for sale on terms significantly in excess of average household incomes in the County.

CPRE Hertfordshire believes that it is critical that the commitment to the permanence of the Green Belts is maintained in planning policy, with alterations only taking place in exceptional circumstances, as presently noted in the NPPF. Green Belt policy continues to be effective in preventing urban sprawl, and at present, the rate of development in Green Belt exceeds significantly that in other protected landscapes, such as National Parks and AONB.

As already noted, developments in the Green Belt are land-hungry and are not providing the truly affordable homes we need to face the housing crisis. Analysis by CPRE of thirteen recently developed Green Belt projects showed that only 5% of the housing built was “social housing” (under the present definitions) which was significantly less than that called for by local planning policy in all cases (CPRE State of the Green Belt Report 2023; London 2023).

The advantages of the Green Belt are readily understood and appreciated. The Green Belt is the countryside next door for millions of people, especially in southern Hertfordshire where it provides crucial breathing space for the metropolis. The physical and mental health benefits of the Green Belt were recognised widely during the recent pandemic. Residents and visitors alike discovered countryside nearby that they did not know existed.

Green Belt land provides a vital space for nature and recreation and includes a significant number of our nature reserves, as well as double the national density of public rights of way, providing access for all. Through the protection and enhancement of Green Belt land, we can increase its natural and recreational values, as well as providing a natural solution to the climate emergency through carbon sequestration.

Crucially, the defining feature of the Green Belt is its permanence, the assurance that it will be maintained for generations to come. CPRE Hertfordshire commends the Council’s proposals to maintain the protection of this highly valued countryside.

Potential sites

CPRE Hertfordshire agrees that the sites detailed in Appendix 1 (survey Question5) should not be proposed for development as a result of taking account of the issues discussed above.

Notwithstanding the significance we attach to all Green Belt sites, we will make no further comments on the individual proposed allocated sites at this stage.

We believe that the position taken by the Council could have significant consequences for the future allocation of Green Belt sites for housing in Hertfordshire and elsewhere. If this approach is accepted by the Government it will strengthen further the protections offered by Green Belt designation with huge benefits for local communities and beyond.

Sustainability Appraisal

The final survey question (Q. 107) relates to the Sustainability Appraisal working note accompanying the consultation. This provides the justification for the promotion of the “Low Growth Option” and presents the standard criteria for the assessment of sustainability.

It is clear that the primary criterion applied is the harm caused to the Green Belt. Very few other criteria indicate significant variation between the options considered. **Accordingly, we support the findings of the Sustainability Appraisal working note.**

Next steps

As noted above, this is our initial commentary on the Part 4 Local Plan. We are now working on a more detailed technical review which we will issue ahead of the 10th December closing date for the consultation.

Please also see our Site Analysis attached to this initial commentary, to understand the specific impact on the Green Belt throughout the District as a whole.

CPRE Hertfordshire
8th November 2023

CPRE Hertfordshire Site Analysis		Three Rivers Preferred Local Plan Reg 18 Part 4 Consultation October to December 2023								03/11/2023
Data from Three Rivers Reg 18 Part 4 Preferred Local Plan Oct 2023				To note: *Gross site area is not necessarily the area that will be developed but used here as may reflect total area to be removed from Green Belt.						
	Proposed Residential Site Allocations	Settlement	Site Ref	Green Belt Y/N	Gross Site* Area/ Ha	Total proposed dwellings	Dwellings in Green Belt	Dwellings on brownfield in GB	Dwellings not in GB	
SITES IN GREEN BELT										
1	Land at Warren Court, Woodside Road	Abbots Langley & Leavesden	CFS4	Y	0.54	26	26			
2	Land adjacent to Fraser Crescent and Woodside Road	Abbots Langley & Leavesden	CFS3	Y	7.1	303	303			
3	Land at Mansion House Equestrian Centre	Abbots Langley & Leavesden	CFS6	Y	2.8	133	133			
4	Land at Love Lane	Abbots Langley & Leavesden	PCS21	Y	1.3	62	62			
5	Land north of Bucknalls Lane	Garston	CFS65	Y	5.8	144	144			
6	North Cott East Lane	Bedmond	NSS6a	Y	0.47	12	12			
7	Flower House 2-3 Station Road	Kings Langley	ACFS8b	Part	0.4	19	19			
8	Land west and south of Maple Cross	Maple Cross	EOS12.4	Y	17.18	850	850			
9	Land to the south of Shepherds Lane and east of the M25	Mill End	EOS7.0	Y	20.8	550	550			
10	Land on London Road	Rickmansworth	CFS59	Y	1.1	40	40			
TOTAL IN GREEN BELT					57.49	2139	2139			
BROWNFIELD SITES IN GREEN BELT										
11	56 High Street, Bedmond	Bedmond	NSS2	Y	0.4	20		20		
12	Land at Mill Place, Hunton Bridge	Kings Langley	NSS10	Y	0.6	20		20		
13	Langleybury House/School	Langleybury	H7	Y	1.97	25		25		
14	Hill Farm, Stag Lane	Chorleywood	CFS18c	Y	0.75	38		38		
15	Heath House Rickmansworth Road	Chorleywood	ACFS1	Y	0.2	10		10		
16	Cinnamond House Cassiobridge	Rickmansworth	CFS61	Part	1.0	133		133		
TOTAL BROWNFIELD IN GREEN BELT					4.92	246		246		
BROWNFIELD SITES NOT IN GREEN BELT										
17	Garage Courts Parsonage Close	Abbots Langley & Leavesden	AB18	N	0.09	7			7	
18	Garages Tibbs Hill Road	Abbots Langley & Leavesden	AB26	N	0.1	7			7	
19	Garages Jacketts Field	Abbots Langley & Leavesden	AB31	N	0.08	6			6	
20	Yard off Tibbs Hill Road	Abbots Langley & Leavesden	AB32	N	0.16	10			10	
21	Garages Rosehill Gardens	Abbots Langley & Leavesden	AB39	N	0.08	6			6	
22	Pin Wei 35 High Street	Abbots Langley & Leavesden	H3	N	0.13	11			11	
23	Furtherfield Depot, Furtherfield	Abbots Langley & Leavesden	H4	N	0.53	36			36	
24	Hill Farm Industrial Estate	Abbots Langley & Leavesden	H6	N	0.13	38			38	
25	Margaret House, Abbots Langley	Abbots Langley & Leavesden	NSS14	N	0.66	25			25	
26	Land at Chorleywood Station (station car park and adjoining land)	Chorleywood	CFS16	N	2.3	190			190	
27	Garages at Copmans Wick	Chorleywood	CW9	N	0.1	6			6	
28	Chorleywood Telephone Exchange Shire Lane	Chorleywood	NSS23	N	0.11	15			15	
29	Garages rear of Longcroft Road	Maple Cross	MC11	N	0.06	5			5	
30	Quickwood Close Garages	Mill End	P4a	N	0.16	7			7	
31	Chiltern Drive Garages	Mill End	P33	N	0.07	6			6	
32	Garages at Whitfield Way	Mill End	P38	N	0.09	6			6	
33	The Queens Drive Garages	Mill End	P39	N	0.11	7			7	
34	Garden land off Uxbridge Road	Mill End	RW31	N	0.17	12			12	
35	Garages rear of Drillyard, West Way	Mill End	H15	N	0.22	13			13	
36	Land at Park Road	Rickmansworth	CFS40a	N	1.8	112			112	
37	Former Police Station Rectory Road	Rickmansworth	H17	N	0.29	24			24	
38	Royal British Legion Ebury Road	Rickmansworth	H18	N	0.08	6			6	
39	Depot Stockers Farm Road	Rickmansworth	H22a	N	0.76	60			60	
40	Land at Croxley Station Watford Road	Croxley Green	CFS20	N	2.3	163			163	
41	Garages Owen's Way	Croxley Green	CG16	N	0.09	6			6	
42	Garages off Grove Crescent	Croxley Green	CG47	N	0.26	19			19	
43	British Red Cross Community Way	Croxley Green	CG65	N	0.06	6			6	
44	33 Baldwins Lane	Croxley Green	H9	N	0.09	10			10	
45	Kebbell House and land to rear Delta Gain	Carpenters Park	CFS12	N	0.9	68			68	
46	Garages at Blackford Road	South Oxhey	AS13	N	0.1	7			7	
47	Garages at Woodhall Lane	South Oxhey	AS31	N	0.09	6			6	
48	Northwick Day Centre Northwick Road	South Oxhey	BR20	N	0.56	48			48	
49	Vivian Gardens	Oxhey Hall	PCS16	N	0.33	8			8	
50	The Fairway Green Lane	Oxhey Hall	H24	N	0.35	32			32	
TOTAL BROWNFIELD					13.41	988			988	
					Hectares	Dwellings				
Green Belt					57.49	2139				
Brownfield in Green Belt					4.92	246				
Brownfield NOT in Green Belt					13.41	988				
TOTALS					75.82	3373				
ADD										
Commitments						1089				
Windfalls						390				
GRAND TOTAL						4852				